

EXHIBIT A



January 31, 2023

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

Christophe Beck, CEO
Nalco Company LLC
1601 W. Diehl Rd.
Naperville, IL 60563

Christophe Beck, CEO
Ecolab, Inc.
1 Ecolab Place
St. Paul, MN 55102

CT Corporation System
Agent for Service of Process
Nalco Company LLC
330 N. Brand Blvd., Suite 700
Glendale, CA 91203

Christopher Puza, Plant Manager
Tim Rosebrough, Quality Assurance
Nalco Company LLC
2111 E. Dominguez St.
Carson, CA 90810

RE: NOTICE OF VIOLATIONS AND INTENT TO FILE SUIT UNDER THE FEDERAL WATER POLLUTION CONTROL ACT ("CLEAN WATER ACT") (33 U.S.C. §§ 1251 *et seq.*)

Dear Mr. Beck Mr. Puza, and Mr. Rosebrough:

This firm represents Los Angeles Waterkeeper ("LA Waterkeeper") in regard to violations of the Clean Water Act ("CWA" or "the Act") and California's General Industrial Storm Water Permit ("General Permit" or "Permit") occurring at Nalco Company LLC at 2111 E. Dominguez Street, Carson, California 90810, with Waste Discharger Identification Number 4 19I019087 (the "Facility"). The Facility manufactures specialty treatment chemicals for industries such as the crude oil and petroleum industry, paper manufacturing industry, water treatment industry for boilers and cooling systems, the waste-water treatment industry, and the steel mining industry. This letter is being sent to you as the responsible owners, officers, and/or operators of the Facility. Unless otherwise noted, Nalco Company LLC and Ecolab Inc., shall hereinafter be referred to as "Nalco" and Christophe Beck, Christopher Puza, and Tim Rosebrough, as the Owners/Operators of the Facility.

LA Waterkeeper is a nonprofit 501(c)(3) public benefit corporation organized under the laws of California with its main office located in downtown Los Angeles, California. LA Waterkeeper was founded in 1993, and its members live, work, and recreate in and around the Los Angeles area. LA Waterkeeper is dedicated to the preservation, protection, and defense of the inland and coastal waters of Los Angeles County including the Dominguez Channel, the Dominguez Channel Estuary, Los Angeles Harbor, and the Pacific Ocean. To further this mission, LA Waterkeeper actively seeks federal and state implementation of the Clean Water Act. Where

CWA Notice of Intent to Sue
Nalco Company LLC
January 31, 2023
Page 2 of 19



necessary, LA Waterkeeper directly initiates enforcement actions on behalf of itself and its members.

Members of LA Waterkeeper work and reside in Los Angeles County, and they use and enjoy the Dominguez Channel and the bordering parks, pathways, golf courses and athletic fields, and downstream the Dominguez Channel Estuary, Los Angeles Harbor, and the Pacific Ocean (the "Receiving Waters")¹.

As explained in detail below, Nalco discharges pollutants into the Receiving Waters, in violation of the Clean Water Act and the Storm Water Permit. LA Waterkeeper members also use and enjoy the Receiving Waters and other connected waterways to bike, boat, kayak, bird watch, ride horses, view wildlife, hike, walk, run, fish, surf, swim, sail, and recreate. Additionally, LA Waterkeeper members use the Receiving Waters to engage in scientific study through pollution and habitat monitoring and restoration activities. The unlawful discharge of pollutants from the Facility into the Receiving Waters impairs LA Waterkeeper's members' use and enjoyment of these waters. The unlawful discharge of pollutants from the Facility requires LA Waterkeeper to expend its limited resources to study and combat pollution from the Facility. Thus, the interests of LA Waterkeeper and its members have been, are being, and will continue to be adversely affected by Nalco's failure to comply with the Clean Water Act and the General Permit.

Nalco is in ongoing violation of the substantive and procedural requirements of the CWA, 33 U.S.C. § 1251 et seq.; and California's General Industrial Storm Water Permit, National Pollution Discharge Elimination System ("NPDES") General Permit No. CAS000001 Water Quality Order No. 2014-0057-DWQ as amended by Order No. 2015-0122-DWQ incorporating: 1) Federal Sufficiently Sensitive Test Method Ruling; 2) Total Maximum Daily Load ("TMDL") Implementation Requirements; and 3) Statewide Compliance Options Incentivizing On-Site or Regional Storm Water Capture and Use, and as subsequently amended by Order 2018-0028-DWQ incorporating TMDL effluent limits (effective July 1, 2020), and is collectively referred to herein as the General Permit or Permit.²

Pursuant to Section 309(d) of the Act (33 U.S.C. § 1319(d)) and the Adjustment of Civil Monetary Penalties for Inflation (40 C.F.R. § 19.4), each separate violation of the CWA commencing five years prior to the date of this Notice of Violation and Intent to File Suit subjects Nalco to a penalty of up \$59,937 per day per violation. In addition to civil penalties, LA Waterkeeper will seek injunctive relief preventing further violations of the Act pursuant to Sections 505(a) and (d) of the Act (33 U.S.C. §§ 1365(a), (d)) and such other relief as permitted by law. Lastly, Section 505(d) of the Act (33 U.S.C. § 1365(d)) permits prevailing parties to recover costs and fees, including attorneys' fees.

¹ The Storm Water Pollution Prevention Plan for the Facility lists Total Maximum Daily Loads for the Dominguez Channel as applicable to storm water discharges from the Facility.

² Nalco submitted its Notice of Intent to comply with the General Permit for the Facility on or about March 29, 2022 which identifies the Receiving Water as Dominguez Channel.

CWA Notice of Intent to Sue
 Nalco Company LLC
 January 31, 2023
 Page 3 of 19



The CWA requires that sixty (60) days prior to the initiation of a citizen-enforcement action under Section 505(a) of the Act (33 U.S.C. § 1365(a)), a citizen enforcer must give notice of its intent to file suit. Notice must be given to the alleged violator, the U.S. Environmental Protection Agency, and the Chief Administrative Officer of the water pollution control agency for the State in which the violations occur. See 40 C.F.R. 135.2.

As required by the Act, this letter provides statutory notice of the violations that have occurred, and continue to occur, at the Facility. 40 C.F.R. § 135.3(a). At the expiration of sixty (60) days from the date of this letter, LA Waterkeeper intends to file suit under Section 505(a) of the Act (33 U.S.C. § 1365(a)) in federal court against Nalco for violations of the Act and the General Permit.

I. Background

A. The Clean Water Act

Congress enacted the CWA in 1972 in order to “restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.” 33 U.S.C. § 1251. The Act prohibits the discharge of pollutants into United States waters except as authorized by the statute. 33 U.S.C. § 1311; *San Francisco Baykeeper, Inc. v. Tosco Corp.*, 309 F.3d 1153, 1156 (9th Cir. 2002). The Act is administered largely through the NPDES permit program. 33 U.S.C. § 1342. In 1987, the Act was amended to establish a framework for regulating storm water discharges through the NPDES system. Water Quality Act of 1987, Pub. L. 100-4, § 405, 101 Stat. 7, 69 (1987) (codified at 33 U.S.C. § 1342(p)); see also *Env’tl. Def. Ctr., Inc. v. EPA*, 344 F.3d 832, 840-41 (9th Cir. 2003) (describing the problem of storm water runoff and summarizing the Clean Water Act’s permitting scheme). The discharge of pollutants without an NPDES permit, or in violation of a NPDES permit, is illegal. *Ecological Rights Found. v. Pac. Lumber Co.*, 230 F.3d 1141, 1145 (9th Cir. 2000).

Much of the responsibility for administering the NPDES permitting system has been delegated to the states. See 33 U.S.C. § 1342(b); see also Cal. Water Code § 13370 (expressing California’s intent to implement its own NPDES permit program). The CWA authorizes states with approved NPDES permit programs to regulate industrial storm water discharges through individual permits issued to dischargers, as well as through the issuance of a single, statewide general permit applicable to all industrial storm water dischargers. 33 U.S.C. § 1342(b). Pursuant to Section 402 of the Act, the Administrator of EPA has authorized California’s State Water Resource Control Board (“State Board”) to issue individual and general NPDES permits in California. 33 U.S.C. § 1342. The State Board coordinates with the Los Angeles Regional Water Quality Control Board (“Regional Board”), which has shared jurisdiction over the Facility for state and federal water pollution control efforts.

CWA Notice of Intent to Sue
 Nalco Company LLC
 January 31, 2023
 Page 4 of 19



B. California's General Permit for Storm Water Discharges Associated with Industrial Activities

Pursuant to authority under the CWA, the State Board issued the General Permit to regulate storm water discharges associated with industrial activities throughout California. Facilities discharging, or having the potential to discharge, storm water associated with industrial activities that have not obtained an individual NPDES permit must apply for coverage under the General Permit by filing an NOI. General Permit Sections XXI.A and I.A.12. Facilities must file their NOIs before the initiation of industrial operations. *Id.*

Facilities must strictly comply with all of the terms and conditions of the General Permit. A violation of the General Permit is a violation of the CWA. General Permit Section XXI.A. The General Permit contains three primary and interrelated categories of requirements: (1) discharge prohibitions, receiving water limitations and effluent limitations; (2) Storm Water Pollution Prevention Plan ("SWPPP") requirements; and (3) self-monitoring and reporting requirements. Beginning under the General Permit Facilities must submit Exceedance Response Action Plans ("ERA Report") to the State Board outlining effective plans to reduce pollutants if a Facility reports a pollutant above the Numeric Action Level ("NAL"). An annual NAL exceedance occurs when the average of all the analytical results for a parameter from samples taken within a reporting year³ exceeds the annual NAL value for that parameter. An instantaneous maximum NAL exceedance occurs when two (2) or more analytical results from samples taken for any single parameter within a reporting year exceed the instantaneous maximum NAL value or are outside of the instantaneous maximum NAL range for pH. General Permit Section XII.A.

On July 1, 2020, updated pollutant-discharge standards including Total TMDL Implementation Requirements became enforceable. General Permit Attachment E. Any exceedances of a Numeric Effluent Limitation ("NEL") or a TMDL Numeric Action Level ("TNAL") following July 2020 is a per se violation of the General Permit and Clean Water Act. For this Facility, applicable Interim TNALs for the Receiving Waters include copper (0.20751 mg/L), lead (0.12288 mg/L), and zinc (0.89887 mg/L). Final copper, lead, and zinc NELs for the Dominguez Channel are 0.0097 mg/L, 0.0427 mg/L, and 0.697 mg/L respectively and become enforceable on May 5, 2032. Final NELs for the Dominguez Channel Estuary which also become enforceable on May 5, 2032 are lower for copper and zinc and slightly higher for lead.

C. Nalco Industrial Facility

The Nalco Facility is located at 2111 E. Dominguez Street, Carson, California, 90810. The Facility's primary industrial purpose is the manufacture of chemicals used for treating crude oil, industrial process water used in steam boilers, cooling towers and

³ A reporting year under the General Permit is July 1 to June 30.

CWA Notice of Intent to Sue
 Nalco Company LLC
 January 31, 2023
 Page 5 of 19



other industrial processes, and wastewater as well as chemicals used the petroleum, paper and mining industries. Industrial activities at the Facility used in the manufacture of these chemicals, include blending chemicals and other materials with water to form chemical solutions which are typically oil or water based. The SWPPP and December 2022 Level 1 ERA Report do not delve into any further detail as to the industrial processes required to produce these chemical products.

The Facility's NOI notes the site is approximately 10 acres, with 2 acres of industrial areas exposed to stormwater. The Facility SWPPP last updated in on January 13, 2023 ("Facility SWPPP") indicates that the Facility is 9.1 acres with 5.4 acres of industrial activities exposed to storm water and 99% impervious. A SWPPP for the Facility from June of 2021 states that the Facility is 395,344 square feet with buildings of 84,064 square feet on site. The Facility SWPPP gives the Facility operating hours as Monday through Friday from 3:30 AM to 3:30 PM. Pursuant to the Facility SWPPP, Nalco operates under Standard Industrial Classification ("SIC") Codes:

- 2869 – Industrial organic chemical, not elsewhere classified
- 2899 – Chemicals and chemical preparations, not elsewhere classified

Under SIC Code(s) 2869 and 2899, Nalco is only required to sample storm water for those required for all permittees: total suspended solids ("TSS"), oil and grease ("O&G"), and pH.

Facilities must also sample and analyze for additional parameters identified on a facility specific basis to reflect pollutant a source assessment, due to receiving water impairments, or as required by the Regional Board. General Permit Section XI.B.6. Pursuant to 2018 Clean Water Act Section 303(d) list of impaired waterbodies, the Dominguez Channel is impaired for copper, indicator bacteria, lead, toxicity, and zinc. The Dominguez Channel Estuary is impaired for copper, lead, dieldrin, zinc, chlordane, benthic community effects, benzo(a)pyrene, benzo(a)anthracene, chrysene, indicator bacteria, lead, PCBs, DDT, phenanthrene, pyrene, and toxicity. The Los Angeles Harbor is listed for copper, lead, chromium, toxaphene, dieldrin, zinc, mercury, cadmium, chlordane, benzo(a)pyrene, benzo(a)anthracene, 2-methylnaphthalene, chrysene, indicator bacteria, lead, PCBs, PAHs, DDT, phenanthrene, pyrene, benthic community effects, and toxicity. Here, the Owners/Operators of Nalco also sample for the TNAL constituent zinc and previously sampled for ammonia, both under a pollutant source assessment detailed in the Facility SWPPP. The Owners/Operators did not sample and analyze storm water for ammonia in the last known sampling event at the Facility on December 11, 2022. LA Waterkeeper believes that due to the impairments listed above, the applicable TNAL, and industrial activity occurring at the Facility, Nalco should also sample and analyze storm water for copper.

The Dominguez Channel is a waterway of historical and natural significance with a watershed comprised of approximately 110 square miles in the southern portion of Los Angeles County which drains to San Pedro Bay an area that once consisted of

CWA Notice of Intent to Sue
 Nalco Company LLC
 January 31, 2023
 Page 6 of 19



marshes and mudflats now hosts the Los Angeles/Long Beach Harbor. Once uncompromised, today 96% of the watershed's total area is developed primarily for residential and industrial use. The Dominguez Channel watershed contains a network of storm drains and smaller flood control channels and extends from the Los Angeles International Airport to the Harbor and drains large portions of Inglewood, Hawthorne, El Segundo, Gardena, Lawndale, Redondo Beach, Torrance, Carson and Los Angeles. LA Waterkeeper is dedicated to the restoration of the watershed by limiting pollution in the waterways to encourage the health of the local ecosystem.

Pursuant to the Facility SWPPP, there are nine (9) buildings on site including two (2) warehouses, indoor production areas in a manufacturing and laboratory building, three (3) storage sheds for areas for bulk storage of industrial materials, an administrative office, a sales building, and a flammable storage area and a storage area identified in the SWPPP as buildings. Also onsite at the Facility is a wastewater treatment area, tanker truck and railcar load/unload areas and several material handling, staging and transfer areas. Raw materials, products or other significant materials are directly exposed to precipitation in at least one of these transfer and handling areas. Industrial activities at these transfer and handling areas include loading and unloading of bulk liquid material at the truck loading station and railcar loading station, pumping of liquid material to and from transporter compartments and bulk storage tanks, and transfer of industrial materials in containers between trucks, the warehouses, the outdoor container storage area, and the manufacturing building via forklift. These industrial materials are stored throughout the Facility in outdoor storage areas, storage tanks, warehouses, and sheds. Liquids are stored in containers that range in size from five (5) gallons to 400 gallons. Dry materials are typically stored in bags in warehouses and storage sheds. Scrap metal is stored in outdoor bins. The Owners/Operators have identified the following areas on site where industrial activities occur: process building, scrap metal bins, storage sheds, tank farm, warehouses, loading stations, rail car loading area, bulk loading area, forklift traffic areas, and the outdoor container storage area. Industrial and commuter vehicle traffic and parking also occurs at the Facility. Waste and hazardous waste at the Facility includes trash dumpsters, empty bags, and pallets, and non-hazardous wastes stored in drums, and the aboveground wastewater treatment system.

Metal shavings, dirt, dust and particulates, and chemical sediment from industrial activities accumulate around the Facility. Dirt and residue from roofs at the Facility contribute to pollutants in storm water. The industrial activities detailed above expose pollutants to storm water via direct contact, building exhaust and ventilation, track out, dust and debris, traffic, and spills and leaks.

Pollutants of concern from these industrial areas and activities at the Facility include ammonia, oil & grease, pH, TSS, copper and zinc. These pollutants are subject to tracking to other areas of the Facility, and offsite of the Facility, by employees, transfer of industrial materials between work areas and the loading docks, vehicles, trains forklifts, and other equipment. These areas of industrial activity generate and

CWA Notice of Intent to Sue
 Nalco Company LLC
 January 31, 2023
 Page 7 of 19



release pollutants at the Facility which are discharged in storm water, including those listed above.

The Facility SWPPP notes that the Facility property slopes north to south and east to west, with industrial storm water flowing to six storm water discharge points from three (3) drainage areas. There are three (3) corresponding storm water sampling points. The discharge points are as follows: Catch Basin ("CB")-1B, CB-2B, CB-2C, CB-2D, CB-3, and Trench Drain 1. A SWPPP for the Facility from June of 2021 identifies (5) drainage areas with five (5) sampling points, two (2) of which have been eliminated. The surviving sampling points are CB-1B, CB-2B, and CB-3A. The Facility SWPPP also lists four (4) non-industrial storm water discharge points (CB-1A, CB-2A, CB-4, and CB-5), two which are located in drainage areas which also contain sampling points: CB-1B and CB-2B. It is unknown to LA Waterkeeper whether storm water sampled from CB-1B, CB-2B, and CB-3A is representative of all industrial storm water discharged from the Facility as required by the Permit or whether storm water discharged from "non-industrial" areas is connected to industrial activity. Based upon publicly available materials industrial activities appear to occur throughout the Facility.

Pursuant to the Facility SWPPP, the drainage area for storm water discharging at CB-1B is in the northwestern portion of the Facility and includes outdoor storage areas, areas where industrial equipment is utilized, waste storage areas and roof runoff from the storage sheds. Storm water discharge points CB-2B and CB-2C are located at southwest of storage buildings, and discharge point CB-2D is to the south of central storage shed. CB-2B is the sampling point for this drainage area, which includes outdoor storage, areas where industrial equipment is utilized, and waste storage areas. This drainage area also receives stormwater generated from the roof runoff from the storage sheds. Sampling point CB-3A is southwest of wastewater treatment system near the western border of the Facility. Trench Drain 1 is located within the primary loading dock area. The drainage area for CB-3A and Trench Drain 1 includes areas where industrial equipment is utilized, outdoor storage areas, truck traffic is present, loading and unloading and shipping and receiving, and waste storage areas. This drainage area is also discharges storm water runoff from the roofs of the warehouses. All storm water discharged from the Facility enters the City of Long Beach Municipal Separate Storm Sewer System ("MS4"), which flows to the Dominguez Channel, or directly to the Dominguez Channel Estuary as described in the Facility SWPPP.

Any person or facility discharging storm water associated with industrial activity must comply with the General Permit. See 33 U.S.C. §§ 1311(a), 1342; 40 C.F.R. § 122.26(c)(1); General Permit Fact Sheet at VII.

On July 1, 2020, the amendment to the General Permit by Order No. 2015-0122 –DWQ became enforceable and updated pollutant-discharge standards including Total TMDL Implementation Requirements and Statewide Compliance Options Incentivizing On-Site or Regional Storm Water Capture and Use. General Permit Attachment E. Any exceedances of a Numeric Effluent Limitations ("NEL") or a TMDL Numeric Action Level

CWA Notice of Intent to Sue
 Nalco Company LLC
 January 31, 2023
 Page 8 of 19



("TNAL") following July 1, 2020 is a per se violation of the General Permit and Clean Water Act. As noted above, applicable TNALs for the Facility include copper (0.20751 mg/L), lead (0.12288 mg/L), and zinc (0.89887 mg/L). Final copper, lead, and zinc NELs for the Dominguez Channel are 0.0097 mg/L, 0.0427 mg/L, and 0.697 mg/L respectively and become enforceable on May 5, 2032. Following the implementation of the TNALs for the Dominguez Channel and, Nalco violated the zinc standard ten (10) times. All eleven (11) storm water samples taken for zinc since the Facility began sampling storm water for zinc have exceeded the future NEL standard and the NAL standard.

Based on its review of available public documents, primarily from SMARTS, LA Waterkeeper is informed and believes that Nalco is in ongoing violation of both the substantive and procedural requirements of the CWA, and the General Permit at the Facility. These violations are ongoing and continuous. Consistent with the five-year statute of limitations applicable to citizen enforcement actions brought pursuant to the CWA, Nalco is subject to penalties for violations of the Act since at least January 31, 2018. LA Waterkeeper expects to identify additional storm water discharges conveying pollutants to the Receiving Waters in violation of the CWA and the General Permit through further investigation of the Facility and as this matter progresses through the rainy season.

A. Nalco Discharges Storm Water Containing Pollutants in Violation of the General Permit's Discharge Prohibitions, Receiving Water Limitations, and Effluent Limitations

Nalco's storm water sampling results provide conclusive evidence of its failure to comply with the General Permit's discharge prohibitions, receiving water limitations and effluent limitations. Self-monitoring reports under the General Permit are deemed "conclusive evidence of an exceedance of a permit limitation." *Sierra Club v. Union Oil*, 813 F.2d 1480, 1493 (9th Cir. 1988).

1. Applicable Water Quality Standards

The General Permit requires that storm water discharges and authorized non-storm water discharges shall not cause or threaten to cause pollution, contamination, or nuisance. General Permit Section III.C. The General Permit also prohibits discharges that violate any discharge prohibition contained in the applicable Regional Board's Basin Plan or statewide water quality control plans and policies. General Permit Section III.D. Furthermore, storm water discharges and authorized non-storm water discharges shall not adversely impact human health or the environment and shall not cause or contribute to a violation of any water quality standards in any affected receiving water. General Permit Sections VI.A, VI.B.

Dischargers are also required to prepare and submit documentation to the Regional Board upon determination that storm water discharges are in violation of the General Permit's Receiving Water Limitations. General Permit Section XX.B. The

CWA Notice of Intent to Sue
 Nalco Company LLC
 January 31, 2023
 Page 9 of 19



documentation must describe changes the discharger will make to its current storm water best management practices (“BMPs”) in order to prevent or reduce any pollutant in its storm water discharges that is causing or contributing to an exceedance of water quality standards. *Id.*

The California Toxics Rule (“CTR”) is an applicable water quality standard under the Permit, the violation of which is a violation of Permit conditions. *Cal. Sportfishing Prot. Alliance v. Chico Scrap Metal, Inc.*, 2015 U.S. Dist. LEXIS 108314, *21 (E.D. Cal. 2015). The CTR establishes numeric receiving water limits for toxic pollutants in California surface waters. 40 C.F.R. § 131.38. The CTR establishes a numeric limit for at least one of the pollutants thought to be discharged by Nalco: zinc—0.12 mg/L and copper—0.013 mg/L (maximum concentration).

The Water Quality Control Plan for the Los Angeles Region (“Basin Plan”) also sets forth water quality standards and prohibitions applicable to Nalco’s storm water discharges. The Basin Plan includes a narrative toxicity standard which states that “[a]ll waters shall be maintained free of toxic substances in concentrations that produce detrimental physiological responses in human, plant, animal, or aquatic life.” The Basin Plan’s Water Quality Standards require a narrower pH range of 6.5 – 8.5 pH units for inland surface waters such as the Dominguez Channel and its watershed. See Basin Plan.

2. Applicable Effluent Limitations

Dischargers are required to reduce or prevent pollutants in their storm water discharges through implementation of best available technology economically achievable (“BAT”) for toxic and nonconventional pollutants and best conventional pollutant control technology (“BCT”) for conventional pollutants. General Permit Section V.A. Conventional pollutants include Total Suspended Solids, Oil & Grease, pH, Biochemical Oxygen Demand and Fecal Coliform. 40 C.F.R. § 401.16. All other pollutants are either toxic or nonconventional. 40 C.F.R. §§ 401.15-16.

Under the General Permit, benchmark levels established by the EPA (“EPA benchmarks”) serve as guidelines for determining whether a facility discharging industrial storm water has implemented the requisite BAT and BCT. *Santa Monica Baykeeper v. Kramer Metals*, 619 F.Supp.2d 914, 920, 923 (C.D. Cal. 2009); General Permit Section XII.A.

The following EPA benchmarks have been recently updated for pollutants discharged by Nalco: total suspended solids—100 mg/L; copper—0.00519 mg/L; lead—0.082 mg/L; aluminum—1.1 mg/L; zinc—0.12 mg/L, oil & grease—15 mg/L; and pH—6-9 s.u. The General Permit uses NAL values based upon previous EPA Benchmarks and are as follows: total suspended solids—100 mg/L; copper—0.0123 mg/L; lead—0.262 mg/L; aluminum—0.75 mg/L; zinc—0.117 mg/L, oil & grease—15 mg/L; iron—1 mg/L;

CWA Notice of Intent to Sue
 Nalco Company LLC
 January 31, 2023
 Page 10 of 19



and pH—6-9 s.u. General Permit Section XI. The Basin Plan's Water Quality Standards require a narrower pH range of 6.5—8.5 pH units.

The General Permit also requires a permittee whose discharges violate the General Permit's Receiving Water Limitations or water quality standards, such as, NALs, TMDLs, TNALs, and NELs to implement additional BMPs or other control measures that are tailored to that facility in order to attain compliance with the receiving water limitation. A Discharger that is notified by a Regional Board or who determines the discharge is causing or contributing to an exceedance of a water quality standard must comply with the Water Quality Based Corrective Actions in Section XX.B of the General Permit and report to the Regional Board regarding same. See General Permit Section XX.B.

3. Nalco's Storm Water Sample Results

As detailed above, Nalco's SWPPP describes five drainage areas, but the Owners/Operators only sample storm water at a single catch basin in three (3) separate drainage areas. Storm drainage from the Facility catch basins and trench drain flows into the MS4 system which empties into the Dominguez Channel or its estuary waters.

Except as provided in Section XI.C.4 of the General Permit, samples shall be collected from each drainage area at all discharge locations. The samples must be: a) Representative of storm water associated with industrial activities and any commingled authorized non-storm water discharges; or, b) Associated with the discharge of contained storm water. At this time, Waterkeeper is unable to determine if storm water from the two sampling points at the Facility is representative of industrial storm water at the Facility.

The following discharges of pollutants from the Facility have violated the discharge prohibitions, receiving water limitations, and effluent limitations of the Permit.

a. Discharges of Storm Water Containing pH Levels in outside of the Applicable Instantaneous Numeric Action Level Range for the and/or Basin Plan Range

Date	Discharge Point	Parameter	Concentration in Discharge (s.u.)	Instantaneous Numeric Value Range (s.u.)	Basin Plan Range (s.u.)
11/20/2019	SP-4	pH	5.8	6.0 - 9.0	6.5 - 8.5
11/20/2019	SP-3	pH	5.9	6.0 - 9.0	6.5 - 8.5
12/4/2019	SP-2	pH	6.4	6.0 - 9.0	6.5 - 8.5
11/20/2019	SP-1	pH	6.1	6.0 - 9.0	6.5 - 8.5
12/4/2019	SP-4	pH	6.4	6.0 - 9.0	6.5 - 8.5
12/4/2019	SP-1	pH	6.4	6.0 - 9.0	6.5 - 8.5
12/4/2019	SP-3	pH	6.4	6.0 - 9.0	6.5 - 8.5

CWA Notice of Intent to Sue
 Nalco Company LLC
 January 31, 2023
 Page 11 of 19



Date	Discharge Point	Parameter	Concentration in Discharge (s.u.)	Instantaneous Numeric Value Range (s.u.)	Basin Plan Range (s.u.)
3/12/2020	SP-4	pH	6.4	6.0 - 9.0	6.5 - 8.5
12/28/2020	SP-2	pH	6.4	6.0 - 9.0	6.5 - 8.5
12/28/2020	SP-3	pH	6.4	6.0 - 9.0	6.5 - 8.5
12/28/2020	SP-1	pH	6.4	6.0 - 9.0	6.5 - 8.5
3/3/2021	SP-3	pH	6.2	6.0 - 9.0	6.5 - 8.5
3/3/2021	SP-2	pH	6.4	6.0 - 9.0	6.5 - 8.5
12/14/2021	SP-4	pH	6.2	6.0 - 9.0	6.5 - 8.5
12/14/2021	SP-1	pH	6.3	6.0 - 9.0	6.5 - 8.5
12/14/2021	SP-2	pH	6.4	6.0 - 9.0	6.5 - 8.5
12/14/2021	SP-3	pH	6.3	6.0 - 9.0	6.5 - 8.5
12/14/2021	SP-5	pH	6.4	6.0 - 9.0	6.5 - 8.5
3/28/2022	SP-1	pH	6.2	6.0 - 9.0	6.5 - 8.5
3/28/2022	SP-2	pH	6.2	6.0 - 9.0	6.5 - 8.5
3/28/2022	SP-3	pH	6.1	6.0 - 9.0	6.5 - 8.5
12/11/2022	SP-1	pH	6.4	6.0 - 9.0	6.5 - 8.5

b. Discharges of Storm Water Containing Ammonia (N) at Concentrations in Excess of Applicable Numeric Action Level

Date	Discharge Point	Parameter	Concentration in Discharge (mg/L)	NAL Value (mg/L)
3/28/2022	SP-3	N	3.37	2.14

c. Discharges of Storm Water Containing Oil and Grease (O&G) at Concentrations in Excess of Applicable Numeric Action Level and Instantaneous Numeric Action Level Value

Date	Discharge Point	Parameter	Concentration in Discharge (mg/L)	NAL Value (mg/L)	Instantaneous NAL Value (mg/L)
12/14/2021	SP-2	O&G	100	15	25

d. Discharges of Storm Water Containing Zinc (Zn) at Concentrations in Excess the Numeric Action Level, Applicable EPA Benchmark Value and/or the TMDL Numeric Action Level

Date	Discharge Point	Parameter	Concentration in Discharge (mg/L)	EPA Benchmark Value (mg/L)	NAL Value (mg/L)	TNAL (mg/L)
12/14/2021	SP-4	Zn	1.1	0.12	0.26	0.89887

CWA Notice of Intent to Sue
 Nalco Company LLC
 January 31, 2023
 Page 12 of 19



Date	Discharge Point	Parameter	Concentration in Discharge (mg/L)	EPA Benchmark Value (mg/L)	NAL Value (mg/L)	TNAL (mg/L)
12/14/2021	SP-1	Zn	1.9	0.12	0.26	0.89887
12/14/2021	SP-2	Zn	3.7	0.12	0.26	0.89887
12/14/2021	SP-3	Zn	4.1	0.12	0.26	0.89887
12/14/2021	SP-5	Zn	1.1	0.12	0.26	0.89887
3/28/2022	SP-3	Zn	2.9	0.12	0.26	0.89887
3/28/2022	SP-1	Zn	2.5	0.12	0.26	0.89887
3/28/2022	SP-2	Zn	2.9	0.12	0.26	0.89887
3/28/2022	SP-5	Zn	0.76	0.12	0.26	0.89887
12/11/2022	SP-1	Zn	1.9	0.12	0.26	0.89887
12/11/2022	SP-2	Zn	2.0	0.12	0.26	0.89887
12/11/2022	SP-3	Zn	2.0	0.12	0.26	0.89887

Nalco's sample results demonstrate violations of the General Permit's discharge prohibitions, receiving water limitations, and effluent limitations set forth above. Waterkeeper is informed and believes that Nalco has known that its storm water contains pollutants at levels exceeding water quality standards since at least January 31, 2018. Over the past several reporting years, Nalco recorded NAL average exceedances for zinc and two samples outside the instantaneous NAL range for pH. During the 2019-2020 reporting year the Nalco Facility entered ERA Level 1 for pH. After beginning to sample for zinc in the 2021-2022 reporting year, Nalco has averaged 2.27 mg/L for zinc, almost nine (9) times the NAL and will likely enter ERA Level two following the 2022-2023 reporting year.

LA Waterkeeper further alleges that additional NAL exceedances would have been reported had the Owners/Operators of Nalco sampled the requisite number of times per reporting year.

LA Waterkeeper alleges that such violations occur each time storm water or non-storm water discharges from the Facility. Attachment A hereto, sets forth the specific rain dates on which LA Waterkeeper alleges that Nalco has discharged storm water containing impermissible levels of copper, O&G, pH, ammonia, and zinc in violation of the General Permit. General Permit, Discharge Prohibitions III.C and III.D, Receiving Water Limitations VI.A, VI.B.

Over the past five (5) reporting years, Nalco has failed to collect the required amount of storm water samples as set forth in Section XI.B(2) of the General Permit.⁴

⁴ Dischargers must collect and analyze a total of four qualifying storm events ("QSEs") each year they are enrolled under the General Permit. Two samples must be collected and analyzed during the first half of the reporting year (July 1 to December 31) and two must be collected and analyzed during the second half of the reporting year (January 1 to June 30). General Permit, Section XI.B(2).

CWA Notice of Intent to Sue
 Nalco Company LLC
 January 31, 2023
 Page 13 of 19



The Nalco Facility has failed to collect the requisite four storm water samples in four (4) out of the last five (5) years.

4. Nalco Has Failed to Implement BAT and BCT

Dischargers must implement adequate BMPs that fulfill the BAT/BCT requirements of the CWA and the General Permit to reduce or prevent discharges of pollutants in their storm water discharges. General Permit Section V.A. To meet the BAT/BCT standard, dischargers must implement minimum BMPs and any advanced BMPs set forth in the General Permit's SWPPP Requirements provisions where necessary to reduce or prevent pollutants in discharges. See General Permit Sections X.H.1-2. Sampling results of orders of magnitude in excess of benchmark levels, as reported by Nalco, are evidence that Nalco does not have BMPs that achieve BAT/BCT (*Santa Monica Baykeeper v. Kramer Metals, Inc.* 619 F. Supp. 2d 914, 925 (C.D. Cal. 2009.)

Nalco has failed to implement the minimum BMPs required by the General Permit at the Facility, including good housekeeping requirements; preventive maintenance requirements; spill and leak prevention and response requirements; material handling and waste management requirements; erosion and sediment controls; employee training and quality assurance; and record keeping. General Permit Sections X.H.1(a–g). The BMPs that are described in the Facility's SWPPP are insufficient to prevent the NAL and/or TNAL exceedances for constituents listed above. As evidenced by these sample results, the current BMPs at the Facility are inefficient, and the Facility's Monitoring Implementation Plan needs improvement.

Nalco has further failed to implement advanced BMPs necessary to reduce or prevent discharges of pollutants in its storm water sufficient to meet the BAT/BCT standards, including: exposure minimization BMPs; containment and discharge reduction BMPs; treatment control BMPs; or other advanced BMPs necessary to comply with the General Permit's effluent limitations. General Permit Section X.H.2. According to the Nalco Facility SWPPP, the Facility's advanced BMP listed in the current SWPPP, other than the buildings on site and small percentages of storm water from the Facility that falls in the small areas confined for discharge to the sanitary sewer, does not qualify as an advanced BMP but rather is a minimum BMP: There is not sufficient containment and discharge reduction BMPs, or treatment control BMPs as appear required to meet the TNALs, NALs and coming NELs. Minimum BMPs at the Facility include only monthly street sweeping, tarps, bin covers, and other assorted housekeeping BMPs. As discussed above, these BMPs are insufficient to achieve compliance with the General Permit.

Each day the Owners/Operators have failed to develop and implement BAT and BCT at the Facility in violation of the General Permit is a separate and distinct violation of Section 301(a) of the CWA (33 U.S.C. § 1311(a)). The violations described above were at all times in violation of Section X of the General Permit. Accordingly, the

CWA Notice of Intent to Sue
 Nalco Company LLC
 January 31, 2023
 Page 14 of 19



Owners/Operators have been in violation of the BAT and BCT requirements at the Facility every day since at least January 31, 2018.

5. Nalco Has Failed to Develop and Implement an Adequate Storm Water Pollution Plan

The General Permit requires dischargers to develop and implement a site-specific SWPPP. General Permit Section X.A. The SWPPP must include, among other elements: (1) the facility name and contact information; (2) a site map; (3) a list of industrial materials; (4) a description of potential pollution sources; (5) an assessment of potential pollutant sources; (6) minimum BMPs; (7) advanced BMPs, if applicable; (8) a monitoring implementation plan; (9) annual comprehensive facility compliance evaluation; and (10) the date that the SWPPP was initially prepared and the date of each SWPPP amendment, if applicable. *See id.*

Dischargers must revise a facility's SWPPP whenever necessary and certify and submit SMARTS their SWPPP within 30 days whenever the SWPPP contains significant revisions(s); and, certify and submit via SMARTS any non-significant revisions not more than once every three (3) months in the reporting year. General Permit Section X.B. The Nalco Facility SWPPP was last updated in September 2021 with an updated map, a visual observation form and a list of advanced BMPs as detailed above that do not meet the General Permit definition for Advanced BMPs. Without implementation of BMPs meeting the Permit standard, LA Waterkeeper alleges that NAL and TNAL exceedances are likely in the future.

LA Waterkeeper's investigation indicates that Nalco has been operating with an inadequately developed or implemented SWPPP in violation of General Permit requirements since at least January 31, 2018. In May of 2021, the Owners/Operators of Nalco were issued a Notice of Violation by the Regional Board detailing certain SWPPP deficiencies. LA Waterkeeper further alleges that Nalco has failed to evaluate the effectiveness of its BMPs and to revise its SWPPP as necessary, resulting in the Facility's unlawful effluent limitation violations. As discussed above, the Facility's 2020 SWPPP lists limited advanced BMPs, and as evidenced by the most recent storm water sampling from the Facility from December 11, 2022, the BMPs deployed at the Facility are insufficient to meet the NAL, TNAL or NEL for zinc.

Last, the General Permit requires a permittee whose discharges violate the General Permit's Receiving Water Limitations to implement additional BMPs or other control measures, in order to attain compliance with the receiving water limitation identifying what additional BMPs will be implemented to achieve water quality standards, along with an implementation schedule. General Permit Section I.E. These new BMPs must then be incorporated into the Facility's SWPPP. Information available to LA Waterkeeper indicates that the Facility Owners/Operators failed to implement sufficient additional BMPs as required by the General Permit following past violations of the NALs and NELs. As such, the Owners and/or Operators are in daily violation of this

CWA Notice of Intent to Sue
 Nalco Company LLC
 January 31, 2023
 Page 15 of 19



improved BMP requirement of the General Permit.

Each day the Owners/Operators failed to develop and implement an adequate SWPPP is a violation of the General Permit. The SWPPP violations described above were at all times in violation of Section X of the General Permit. The Owners/Operators have been in violation of these requirements at the Facility every day since at least January 31, 2018.

6. Nalco has Failed to Develop, Implement, and/or Revise an Adequate Monitoring and Reporting Program

Section X.I of the General Permit requires Facility Owners/Operators to develop and implement a Monitoring Implementation Plan ("MIP"). The primary objective of the monitoring and reporting requirements is to detect and measure the concentrations of pollutants in a facility's discharge to ensure compliance with the General Permit's Discharge Prohibitions, Effluent Limitations, and Receiving Water Limitations. See General Permit Fact Sheet, Section II.J(1). Monitoring undertaken must therefore determine whether pollutants are being discharged, and whether response actions are necessary, and must evaluate the effectiveness of BMPs. See General Permit, Section I.K(70).

Section XI.A of the General Permit requires dischargers to visually observe and collect samples of storm water from all locations where storm water is discharged. Under XI.B of the General Permit, the Facility Owners/Operators are required to collect at least two (2) samples from each discharge location at their Facility during the first half of the reporting year, and then again during the second half of the reporting year. Storm water samples must be analyzed for total suspended solids, pH, oil & gas, and other pollutants that are likely to be present in the Facility's discharges in significant quantities, and as required under the General Permit pursuant to a Facility SIC Code. See General Permit Section XI.B(6). As detailed above, the Facility has a history of insufficient sampling and reporting, in violation of the General Permit.

The Facility Owners'/Operators' failure to conduct sampling and monitoring as required by the General Permit demonstrates that it has failed to develop, implement, and/or revise an MIP that complies with the requirements of Section XI of the General Permit. Every day that the Facility Owners/Operators conduct operations in violation of the specific monitoring requirements of the General Permit, or with an inadequately developed and/or implemented MIP, is a separate and distinct violation of the General Permit, and the Clean Water Act. The Facility Owners/Operators have been in daily and continuous violation of the General Permit's MIP requirements every day since at least January 31, 2018. These violations are ongoing, and Waterkeeper will include additional violations when information becomes available, including specifically continuing violations of the General Permit monitoring requirements (see General Permit, Section XI). The Facility Owners/Operators are subject to civil penalties for all violations of the Clean Water Act occurring since January 31, 2018.

CWA Notice of Intent to Sue
 Nalco Company LLC
 January 31, 2023
 Page 16 of 19



7. Failure to Comply with the General Permit's Reporting Requirements

Section XVI of the General Permit requires a permittee to submit an Annual Report to the Regional Board by July 1 of each year. Section XVI of the Permit requires that the Annual Report include a compliance checklist that indicates that a discharger complies with and has addressed all applicable requirements of the Permit, an affirmation of visual observations and sampling results, an identification and explanation of any non-compliance, an identification of all revisions made to the SWPPP, within the reporting year, and the date of the Annual Evaluation. General Permit Section XVI. Laboratory reports of sample analysis, the annual comprehensive site compliance evaluation report, an explanation of why a permittee did not implement any activities required are also reporting requirements throughout the reporting year and are typically uploaded into the SMARTS portal.

The Permit also requires a permittee whose discharges violate the General Permit's Receiving Water Limitations or water quality standards, such as, NALs, TMDLs, TMDL-Specific Numeric Action Levels, and Numeric Effluent Limits, to implement additional BMPs or other control measures that are tailored to that facility in order to attain compliance with the receiving water limitation. See General Permit Section I.C.36. A Discharger that is notified by a Regional Board or who determines the discharge is causing or contributing to an exceedance of a water quality standard must comply with the Water Quality Based Corrective Actions in Section XX.B of the Permit and report to the Regional Board regarding same. See General Permit Section XX.B. A discharger who violates an NEL must also comply with the Water Quality Based Corrective Actions of the Permit. See General Permit Sections V(C), VII(A)(1), VII(E) and Attachment E. These requirements have not been met at Nalco. Rather than committing to good faith reporting of storm water discharges as required under the Permit, the Owners/Operators developed a plan to cease sampling for the NEL parameters without justification.

Information available to LA Waterkeeper indicates that the Facility Owners/Operators have failed to accurately report their non-compliance with the General Permit and collect storm water and then report storm water sampling analysis in compliance with the Permit, and thus the Facility's Annual Reports are inaccurate. In addition, the Owners/Operators have failed to prepare, implement, and report on its Water Quality Based Corrective Actions as required by the Permit. As such, the Owners/Operators are in daily violation of the General Permit. Every day the Nalco Facility Owners/Operators conduct operations at the Facility without reporting as required by the General Permit is a separate and distinct violation of the General Permit and Section 301(a) of the Clean Water Act, 33 U.S.C. §1311(a). The Facility Owners/Operators have been in daily and continuous violation of the General Permit's reporting requirements every day since at least January 31, 2018. These violations are ongoing, and LA Waterkeeper will include additional violations when information becomes available, including specifically violations of the General Permit reporting

CWA Notice of Intent to Sue
Nalco Company LLC
January 31, 2023
Page 17 of 19



requirements (see General Permit, Section XVI). The Facility Owners/Operators are subject to civil penalties for all violations of the Clean Water Act occurring since January 31, 2018.

III. Persons Responsible for the Violations

LA Waterkeeper puts Nalco on notice that it is the entity responsible for the violations described above. If additional persons are subsequently identified as also being responsible for the violations set forth above, LA Waterkeeper puts Nalco on formal notice that it intends to include those persons in this action.

IV. Name and Address of Noticing Party

The name, mailing address, and telephone number of the noticing party is as follows:

Barak J. Kamelgard
Benjamin A. Harris
Los Angeles Waterkeeper
360 E 2nd Street Suite 250
Los Angeles, CA 90012
(310) 394-6162
Barak@lawwaterkeeper.org
Ben@lawwaterkeeper.org

V. Counsel

LA Waterkeeper has retained legal counsel to represent it in this matter. Please direct all communications to:

Anthony M. Barnes
Jason R. Flanders
Aqua Terra Aeris Law Group
4030 Martin Luther King Jr. Way
Oakland, CA 94609
(917) 371-8293
amb@atalawgroup.com
jrf@atalawgroup.com

VI. Conclusion

LA Waterkeeper believes this Notice of Violations and Intent to File Suit sufficiently states grounds for filing suit. We intend to file a citizen suit under Section 505(a) of the CWA against Nalco and its agents for the above-referenced violations upon the expiration of the 60-day notice period. If you wish to pursue remedies in the

CWA Notice of Intent to Sue
Nalco Company LLC
January 31, 2023
Page 18 of 19



absence of litigation, we suggest that you initiate those discussions within the next twenty (20) days so that they may be completed before the end of the 60-day notice period. We do not intend to delay the filing of a complaint in federal court if discussions are continuing when that period ends.

Sincerely,

A handwritten signature in blue ink, appearing to read "Anthony M. Barnes", is written over a horizontal line.

Anthony M. Barnes
Aqua Terra Aeris Law Group

CWA Notice of Intent to Sue
Nalco Company LLC
January 31, 2023
Page 19 of 19



SERVICE LIST

VIA US MAIL

Merrick Garland
U.S. Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530-0001

Martha Guzman
Regional Administrator
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Michael S. Regan
Administrator
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460 (1101A)

Deborah Smith
Executive Officer
Los Angeles Regional Water Quality
Control Board
320 W 4th Street, #200
Los Angeles, California 90013

Eileen Sobeck
Executive Director
State Water Resources Control Board
P.O. Box 100
Sacramento, California 95812-0100

STATION	NAME	DATE	PRCP
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	2/26/2018	0.21
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	3/2/2018	0.3
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	3/10/2018	0.36
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	3/15/2018	0.11
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	3/16/2018	0.17
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	3/22/2018	0.35
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	10/12/2018	0.34
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	10/13/2018	0.21
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	11/22/2018	0.41
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	11/29/2018	0.84
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	12/6/2018	1.64
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	1/5/2019	0.78
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	1/7/2019	0.12
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	1/12/2019	0.69
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	1/14/2019	1.05
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	1/15/2019	0.93
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	1/16/2019	0.98
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	1/17/2019	0.59
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	1/31/2019	1.24
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	2/2/2019	1.39
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	2/3/2019	0.27
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	2/4/2019	0.37
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	2/5/2019	0.11
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	2/9/2019	0.15
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	2/10/2019	0.1
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	2/13/2019	0.19
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	2/14/2019	2.25
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	2/15/2019	0.16
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	3/2/2019	0.85
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	3/5/2019	0.1
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	3/6/2019	0.86
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	5/16/2019	0.25
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	5/19/2019	0.18
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	11/20/2019	0.38
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	11/27/2019	0.18
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	11/28/2019	2.18
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	11/29/2019	0.1
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	12/4/2019	0.82
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	12/22/2019	0.24
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USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	12/25/2019	1.03
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	12/26/2019	1.14
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	1/17/2020	0.15
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	1/21/2020	0.1
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	2/9/2020	0.3
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	3/12/2020	1.23

STATION	NAME	DATE	PRCP
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	3/13/2020	0.5
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	3/16/2020	0.27
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	3/22/2020	0.71
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	4/5/2020	0.14
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	4/6/2020	0.74
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	4/7/2020	0.82
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	4/9/2020	0.89
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	4/10/2020	0.36
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	12/28/2020	1.49
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	1/23/2021	0.37
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	1/25/2021	0.17
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	1/28/2021	0.49
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	1/29/2021	0.34
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	3/3/2021	0.48
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	3/10/2021	0.6
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	3/11/2021	0.21
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	3/15/2021	0.18
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	10/23/2021	0.14
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	10/25/2021	0.13
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	12/14/2021	0.88
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	12/23/2021	1.32
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	12/24/2021	0.41
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	12/25/2021	0.29
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	12/29/2021	0.6
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	12/30/2021	2.07
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	3/19/2022	0.14
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	3/28/2022	0.72
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	4/22/2022	0.15
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	6/22/2022	0.11
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	9/9/2022	0.2
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	10/12/2022	0.1
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	11/8/2022	0.86
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	12/11/2022	0.91
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	12/12/2022	0.45
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USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	1/4/2023	0.3
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USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	1/10/2023	0.93
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	1/14/2023	1.72
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	1/15/2023	0.38
USW00023129	LONG BEACH DAUGHERTY AIRPORT, CA US	1/16/2023	0.56